

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF  
PENNSYLVANIA**

**In re:**

**TIGIST GUEBREYES,  
Debtor**

**: CHAPTER 13**

**: BANKRUPTCY NO. 16-14007**

**DEBTOR'S ANSWER TO TRUSTEE'S MOTION TO DISMISS**

The Debtor has not delayed in prosecuting this case. The plan calls for a loan modification of the Debtor's first mortgage, on which she and a relative are engaged in obtaining, or a payment of allowed arrears to the first mortgagee, and an objection to the arrears requested by the first mortgagee and a proceeding to avoid the junior mortgages are pending. The plan payments are current through December, 2016, and a payment will be made shortly for January, 2017.

WHEREFORE, the Debtor requests that the Trustee's Motion to Dismiss this bankruptcy case be denied.

Date: January 7, 2017

Attorney for Debtor

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